

1 **PATRICK W. KANG, ESQ.**

2 Nevada Bar No.: 10381

3 **KYLE R. TATUM, ESQ.**

4 Nevada Bar No.: 13264

5 **CHRISTIAN Z. SMITH, ESQ.**

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9 **KANG & ASSOCIATES, PLLC**

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16 *Attorneys for Plaintiff*

17 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

18 TORIE WILLIFORD, an Individual,

19 Plaintiff,

20 v.

21 COVENANT CARE VEGAS, INC. dba
22 SILVER HILLS HEALTH CARE
23 CENTER, a Foreign Corporation; DOES 1
24 Through 25, inclusive; and ROE
25 CORPORATIONS 1 Through 25, inclusive,
Defendants.

26 Case No.: 2:21-cv-2203-GMN-NJK

27 **STIPULATION AND ORDER TO**
DISMISS PLAINTIFF'S LAWSUIT WITH
PREJUDICE

1 **STIPULATION AND ORDER TO DISMISS PLAINTIFF'S LAWSUIT WITH**
2 **PREJUDICE**

3 Plaintiff, TORIE WILLIFORD, by and through her counsel of record of KANG AND
4 ASSOCIATES, PLLC, and Defendant, COVENANT CARE VEGAS, INC. DBA SILVER HILLS
5 HEALTH CARE CENTER, by and through its counsel of record of FENNEMORE CRAIG, P.C.
6 and MORGAN, LEWIS & BOCKIUS, LLP, having reached a full and final resolution of this
7 matter, hereby stipulate and agree to the following:

8 IT IS HEREBY STIPULATED Plaintiff's Complaint shall be DISMISSED WITH
9 PREJUDICE against all named Defendants.

10 IT IS HEREBY FURTHER STIPULATED by and between the parties that each side bear
11 their own attorneys' fees and costs.

12
13 DATED this 22nd day of August, 2023

14 KANG & ASSOCIATES, PLLC

15 /s/ Patrick W. Kang, Esq.

16 PATRICK W. KANG, ESQ.

17 Nevada Bar No. 10381

18 KYLE R. TATUM, ESQ.

19 Nevada Bar No.: 13264

20 CHRISTIAN Z. SMITH, ESQ.

21 Nevada Bar No. 8266

22 PAUL H. WOLFRAM, ESQ.

23 Nevada Bar No.: 16025

24 6480 W. Spring Mountain Rd., Ste. 1

25 Las Vegas, NV 89146

Attorneys for Plaintiff

12
13 DATED this 22nd day of August, 2023

14 FENNEMORE CRAIG, P.C.

15 /s/ Joseph V. Marra III, Esq.

16 LESLIE BRYAN HART, ESQ.

17 Nevada Bar No. 4932

18 JOSEPH V. MARRA III, ESQ. (*pro hac vice*)

19 California State Bar: 238181

20 *Attorneys for Defendant*

21 *Covenant Care Vegas, Inc.*

ORDER

IT IS HEREBY ORDERED that the instant matter shall be dismissed against all named Defendants with prejudice.

IT IS HEREBY FURTHER ORDERED that each side will bear its own attorneys' fees and costs.

DATED this 28 day of August, 2023.

Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

Submitted by:

KANG & ASSOCIATES, PLLC

/s/Patrick W. Kang, Esq.

Patrick W. Kang, Esq.

Nevada Bar No.10381

6480 W. Spring Mountain Road., Ste.1

Las Vegas, NV 89146

Attorneys for Plaintiff

THE INFLUENCE OF CULTURE ON LANGUAGE

RE: Case No.: 2:21-cv-2203-GMN-NJK Williford vs. Covenant Care Vegas- Stipulation and Order to Dismiss Plaintiff's Lawsuit with Prejudice

Marra, III, Joseph V.

Tue 8/22/2023 3:44 PM

To:Jhana Richardson <jrichardson@acelawgroup.com>

Cc:McGuigan, Kathryn T. <kathryn.mcguigan@morganlewis.com>;lhart@fennemorelaw.com <lhart@fennemorelaw.com>;pkang acelawgroup.com <pkang@acelawgroup.com>;Paul Wolfram <pwolfram@acelawgroup.com>;hcaifano acelawgroup.com <hcaifano@acelawgroup.com>;Megan Kay <mkay@acelawgroup.com>;scho acelawgroup.com <scho@acelawgroup.com>

Thank you Jhana,

You have my permission to add my */s/ Joseph V. Marra III* signature and file.

Joe

Joseph V. Marra III

Morgan, Lewis & Bockius LLP

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From: Jhana Richardson <jrichardson@acelawgroup.com>

Sent: Tuesday, August 22, 2023 1:47 PM

To: Marra, III, Joseph V. <joseph.marra@morganlewis.com>

Cc: McGuigan, Kathryn T. <kathryn.mcguigan@morganlewis.com>; lhart@fennemorelaw.com; pkang acelawgroup.com <pkang@acelawgroup.com>; Paul Wolfram <pwolfram@acelawgroup.com>; hcaifano acelawgroup.com <hcaifano@acelawgroup.com>; Megan Kay <mkay@acelawgroup.com>; scho acelawgroup.com <scho@acelawgroup.com>

Subject: Case No.: 2:21-cv-2203-GMN-NJK Williford vs. Covenant Care Vegas- Stipulation and Order to Dismiss Plaintiff's Lawsuit with Prejudice

[EXTERNAL EMAIL]

Dear Counsel,

Please review the attached Stipulation and Order to Dismiss Plaintiff's Lawsuit with Prejudice. Upon approval, please affix your e-signature. Thank you!

Sincerely,
Jhana Richardson
Paralegal

